

FINDING OF NO SIGNIFICANT IMPACT (FONSI)
Environmental Assessment No. OR-030-08-004
Pedro Mountain Geographic Unit Grazing Permit Renewal
Environmental Assessment

The attached Environmental Assessment (EA 030-08-004, which was issued on October 4, 2011, (2011 EA) and is an updated version of EA issued March 5, 2009, contains a description of the proposed action; an analysis of expected impacts on affected interests, land and resources; and measures to reduce negative impacts. The EA also describes and analyzes the impacts of a range of alternatives developed through scoping, and indicates that the proposed action with specific design criteria would not significantly affect the human environment.

The BLM established proposed priorities for Geographic Unit (GU) evaluations and for preparations of Coordinated Activity Plans in the Baker RMP (1989). These plans would have addressed all resource issues in one plan. The Planning Update of February 2000 refined this direction to focus on the Healthy Rangelands initiative. The Update established the schedule for evaluation of the GUs using the Rangeland Standards and Guidelines for Livestock Grazing Management process.

The permittees for the Pedro Mountain allotments were informed about the field work being done in their allotments in 2006 and were invited to participate in rangeland utilization and trend monitoring, Proper Functioning Condition (PFC) assessments, and Standards and Guidelines for Rangeland Health assessments (S&Gs). The monitoring and assessments were completed by multiple members of BLM's staff over many different trips to the allotments.

Letters notifying the public, newspapers, permittees, other agencies, and tribal representatives regarding the process and the upcoming public meeting, were sent out in early November of 2007. The BLM offered to meet individually with the tribes involved. A public meeting was held on November 13, 2007, to provide an overview of the process, distribute the Evaluation and Determinations documents and to answer questions. BLM accepted comments on the Evaluation and Determinations document at the public meeting (and 30 days subsequent to it) and at individual meetings with the permittees in 2007 and 2008. Comments were received about some of the riparian zones, whether they were truly significant enough to be called riparian, and about the fencing and grazing date changes being recommended. No written comments or proposals were provided to BLM to describe an alternative; therefore, no permittee proposals were analyzed as an alternative.

The EA was first issued along with the unsigned FONSI on March 5, 2009, allowing for a 30-day comment period. Comments were received from the Oregon State Historic Preservation Council (SHPO), Hells Canyon Preservation Council (HCPC) and The Confederated Tribes of the Umatilla Indian Reservation (CTUIR). BLM has reviewed and considered these comments and made changes to the EA, which includes the addition of a sub-alternative that permanently

reduces or eliminates livestock grazing within 9 of the allotments analyzed. In addition new information regarding the management of sage-grouse habitat was published after the EA was originally sent out for public comment. BLM then solicited additional public comments. A list describing those comments received and edits made to the EA by BLM may be found in Appendix 14 of the 2011 EA.

The BLM received comments from HCPC dated November 4, 2001, concerning the misuse of riparian stubble height targets. As a result of these comments, the BLM made clarifications to the 2011 EA on page 15 documenting that the BLM is appropriately using riparian stubble height targets which is consistent with the University of Idaho Stubble Height Study Report. In addition on page 15 of the 2011 EA, the BLM added the allotment names where trend monitoring shows that the interim management changes are making significant progress towards the attainment of rangeland health standards 1 and/or 3, which are Bowman Flat and Rye Valley.

After careful review and consideration of impacts of the various alternatives, I have chosen Alternative 3 in the 2011 EA. This alternative changes season of use, reduces AUMs in some of the allotments, implements utilization and minimum riparian stubble height standards, allows gap fence, riparian exclosure, and continuation of allotment fence line construction, and includes consequences for exceeding utilization limits. A reasonable level of livestock management flexibility and sustained forage availability would be provided to permittees with this alternative. Customary permittee grazing practices would be changed in order to protect riparian/wetland and upland vegetation health. Allotment specific description of Alternative 3 is listed below.

Summit Spring Allotment #1072

1. Change dates on permit: was 10/5-11/30 (spring use inadvertently left off the current ten-year permit), change to 4/30-6/23, 10/15-12/10, still alternating between spring use two years in a row and fall use two years in a row. The spring turnout would be changed from 4/20 to 4/30 because usually 4/20 is too early on this high-elevation allotment that contains a high percentage of north slopes.
2. Spring use would always end by June 23 even if turnout was late.
3. Fall use would end when riparian stubble height reaches 3-4 inches. This would ensure that enough vegetation is left on stream banks to protect them during spring runoff.
4. Spring developments must all be maintained and fully functional before turnout every year. Functional spring developments would help draw cattle away from the creeks where riparian watershed standards are not fully met. If the springs are not maintained, livestock grazing would not be authorized until the springs are fully functional. Failure to meet end-of-season stubble height targets for two consecutive years in Summit Spring Allotment would result in resting that allotment the third year.
5. Upland utilization target would be set at 50 percent. Failure to meet upland utilization targets for two consecutive years in Rye Valley Allotment would result in resting that pasture the third year.

Rye Valley Allotment #1037

1. Change dates on permit: was 10/20-11/28 (spring use inadvertently left off the ten-year permit), change to 4/23-5/31, 11/1-12/9 for East Pasture, 6/1-6/30 and 10/1-10/30 for West Pasture. The spring use would be changed from 4/16 to 4/23 because soil moisture conditions are usually not reached by 4/16. The late fall use in the East Pasture would be scheduled to avoid growing season use every spring. From 1997 to the 2007 grazing season, this pasture has been used every year in spring due to difficulty using it in the fall. But the evaluation determined a need to go back to periodic fall use to improve range trend. Cattle are drawn to the private green hayfield during the fall instead of the steeper dry slopes of public lands. The likely scenario is that most years of scheduled fall use would be close to a rest treatment because cattle do not want to stay in this allotment in fall. The dates on the West Pasture allow it to be used for brief periods in spring or fall, which is consistent with alternating spring/fall use in the adjacent Clough Gulch Allotment, (managing the West Pasture for riparian improvement).
2. Use in Rye Valley East Pasture would be deferred until November 1 – December 9 in one out of two years or two out of four years.
3. Fall use would end when riparian stubble height reaches 3-4 inches. This would ensure that enough vegetation is left on streambanks to protect them during spring runoff. Riparian vegetation re-growth would be considered when pastures are grazed in the early spring. Failure to meet end-of-season stubble height targets for two consecutive years in either pasture of Rye Valley Allotment would result in resting that pasture the third year.
4. Upland utilization target would be set at 50 percent. Failure to meet upland utilization targets for two consecutive years in Rye Valley Allotment would result in resting that pasture the third year.
5. Specify 215 public land AUMs in Rye Valley East Pasture and 48 AUMs available in Rye Valley West Pasture. Previously, there were years when all 263 AUMs were used in East Pasture due to confusion about the allotment boundaries. This action would help prevent overuse of the East Pasture because it spreads the use over both pastures.

Upper Shirttail Allotment #1024

1. Change dates on permit: was 5/1-10/13, change to 6/1-6/30, 10/1-10/31. This would simply verify what is already being done; long periods of summer use are already discontinued under the current plan because continuous summer use resulted in over use of the riparian species.
2. A 3-4-inch end-of-growing season riparian stubble height target would be established on the public land portion of Ray Creek. Failure to meet key area end-of-growing riparian season stubble height targets for two consecutive years in Upper Shirttail Creek Allotment would result in limiting use in the third year only to the amount of exchange-of-use or private land AUMs.
3. Upland utilization target would be set at 50 percent. Failure to meet upland utilization targets for two consecutive years in Upper Shirttail Creek Allotment would result in limiting use in the third year only to the amount of exchange-of-use or private land AUMs.
4. Cut and drop juniper into riparian zone for riparian protection (i.e., jack strawing); project acreage is two acres along 0.2 mile of Ray Creek.

Dixie Creek Allotment #1020 (Lower and Upper Deer Creek Pastures)

1. Change dates on permit: was 5/1-10/13, change to 4/22-6/30, 10/1-10/31 (alternating between spring use and fall use, not both in same year). The lower elevation pasture (Lower Deer Creek), is suitable for earlier use, 4/22-5/31. To achieve riparian improvement in this pasture, early grazing followed by re-growth throughout the summer would leave the desired amount of streamside vegetation stubble height. This pasture would alternately be grazed in fall instead of spring to give the upland vegetation deferment from growing-season use during the plant critical growth stage. The upper pasture would alternate between June use and October use to defer grazing during the plant critical growth stage. When grazed in October livestock would be removed from the pasture once stubble heights reach 3-4 inches.
2. Build new gap fences (0.7 mile) to fully enclose the allotment to control livestock use. Until the Pedro Deer Creek Gap fence is completed the fall grazing (10/1 to 10/31) would be subject to cancellation in the Upper Deer Creek Pasture (if unauthorized use during the summer occurs due to lack of this fence and it results in exceeding utilization targets).
3. Reduce grazing preference from 404 AUMs to 343 AUMs (15 percent reduction) based on steep slopes (over 50%) not being suitable for grazing. Specifically, the last stocking rate analysis did not take slope into consideration for the Dixie Creek Allotment. In this analysis slopes greater than 50 percent were treated the same as areas with gentler slopes even though livestock use has been shown to be substantially less in areas that have slopes greater than 50 percent (Mueggler 1965, Gillen et al. 1984, Pinchak et al. 1991, Holechek 1988). Livestock congregate on riparian areas for shade and higher quality forage and try to avoid steep slopes. Reducing livestock AUMs by this amount would reduce livestock riparian impacts, and will aid in attaining a 3-4 inch riparian stubble height which the BLM expects will make significant progress towards meeting riparian rangeland health (Standards 2 and 4). The new gap fences would prevent livestock from crossing the unfenced Pedro Mountain Allotment and Dixie Creek Allotment boundary. The BLM believes the proposed gap fence along with the 15 percent AUM reduction will aid in attainment of a 3-4 riparian stubble height target which is needed to make significant progress towards meeting riparian rangeland health.
4. Upland utilization target would be set at 50 percent. Failure to meet upland utilization targets for two consecutive years in Dixie Creek Allotment would result in limiting use in the third year only to the amount of exchange-of-use or private land AUMs.
5. Failure to meet end-of-season upland utilization or riparian stubble height targets for two consecutive years in any pasture of Dixie Creek Allotment would result in limiting use in that pasture in the third year only to the amount of exchange-of-use or private land AUMs.

Bowman Flat Allotment #1022

1. Change dates on permit: was 5/1-7/9, change to 9/16-10/15, 6/1-6/30, alternating between early use and late use, reducing time spent in the allotment each year (larger number of animals for shorter time). This would allow more time for riparian vegetation and upland vegetation to recover from grazing.

2. Livestock would be removed from the allotment once riparian stubble height reaches 3-4 inches. Failure to meet end-of-season stubble height targets for two consecutive years in the Bowman Flat Allotment would result in resting that pasture the third year.
3. Upland utilization target would be set at 50 percent. Failure to meet upland utilization targets for two consecutive years in Bowman Flat Allotment would result in resting that pasture the third year.
4. Cut and drop juniper into Poor's Creek riparian zone for riparian protection; project acreage equals two acres, spot treatment along half-mile of stream. Jack strawed juniper would block livestock access to the stream and provide woody debris. Jack strawing is a forestry technique that involves selective cutting and dropping of mature trees for use as a barrier to restrict access.
5. 2007 and 2010 were years of total rest to jumpstart recovery; this action has already been taken. Trend plots were read in 2010 and verify there is significant progress towards meeting rangeland health.
6. Failure to meet end-of-season utilization targets for two consecutive years in Bowman Flat Allotment would result in resting that allotment the third year.

Rattlesnake Gulch Allotment #1023

1. Change dates on permit: shown above for Dixie Creek Allotment. This allotment currently is managed as part of the Upper Deer Creek Pasture of Dixie Creek Allotment.
2. Livestock would be removed from the allotment once key area riparian stubble height (See #5 below) reaches 3-4 inches. Failure to meet end-of-season stubble height targets for two consecutive years would result in limiting use in the third year only to the amount of exchange-of-use or private land AUMs.
3. Upland utilization target would be set at 50 percent. Failure to meet upland utilization targets for two consecutive years in Rattlesnake Gulch Allotment would result in limiting use in the third year only to the amount of exchange-of-use or private land AUMs.
4. Reduce grazing preference from 92 AUMs to 55 AUMs and reduce exchange of use from 61 AUMs to 48AUMs based on steep slopes (over 50%) not being suitable for grazing without causing excessive use in riparian zones (Mueggler 1965, Gillen et al. 1984, Pinchak et al. 1991, Holechek 1988). Livestock congregate on riparian areas for shade and higher quality forage and try to avoid steep slopes. Reducing livestock AUMs by this amount would reduce livestock riparian impacts, and will aid in attaining a 3-4 inch riparian stubble height which the BLM expects will make significant progress towards meeting Standards 2 and 4.
5. Key area end-of-season stubble height targets would be based on monitoring of Upper Deer Creek Pasture riparian zone. The other key area would be the upland plot in close proximity to upper Rattlesnake Gulch drainage.

French Creek Allotment #1032

1. A private/public land boundary fence would be constructed. This would allow greater control of livestock on public lands and reduce use on public land. The public land pasture to be used for brief periods in spring and in fall each year, but primarily spring in years when Summit

Spring is used in the fall, and primarily fall in years when Summit Spring is used in the spring. Livestock would be removed from the pasture once riparian stubble height reaches 3-4 inches, spring and fall both. This pasture fence would require a cattle guard.

2. Livestock would be removed from the allotment once riparian stubble height reaches 3-4 inches. Failure to meet end-of-season stubble height targets for two consecutive years in the French Creek Allotment would result in resting that pasture the third year.
3. Upland utilization target would be set at 50 percent. Failure to meet upland utilization targets for two consecutive years in the French Creek Allotment would result in limiting use in the third year only to the amount of exchange-of-use or private land AUMs.
4. Until the new fence is completed, seasons of use would be set at 4/16-6/30 for spring use and 10/5-12/20 for fall use with the same utilization triggers as above.
5. Currently, allotment #1032 is a "C" allotment, there are no restrictions on when it can be grazed, and some grazing occurs in all seasons. Alternative 3 would impose specified amounts of grazing use at specified seasons, in order to make significant progress towards achieving rangeland health standards.

Hollowfield Canyon #1030

1. Change dates on permit: was 6/22-8/21, change to outside parameters of 10/1-11/30, but no more than six weeks within this time frame. This means the permit would say 10/1-11/30. The billed use would be six weeks sometime within this time frame. Postponing use until after 10/1 would allow plants to complete their life cycle, and grazing would not begin until the hot season is past and cattle are less likely to linger in riparian zones.
2. Cut and drop juniper into riparian zone for riparian protection (i.e., jack strawing); project acreage is one acre, spot treatment along 0.25 mile of stream.
3. Stubble height triggers for moving cattle off in the fall would be 3-4 inches. Initially, protection from overutilization would be provided by the jack strawed junipers dropped in riparian zones.
4. Failure to meet stubble height targets for two consecutive years in Hollowfield Canyon Allotment would result in limiting use in the third year only to the amount of exchange-of-use or private land AUMs.
5. Upland utilization target would be set at 50 percent. Failure to meet upland utilization targets for two consecutive years in the Hollowfield Canyon Allotment would result in limiting use in the third year only to the amount of exchange-of-use or private land AUMs.

North Dixie Creek Allotment #1026 (Two pastures, Upper North Dixie and Lower North Dixie)

1. Change dates on permit: was 6/1-11/30, change to 6/1-6/30, 9/28-12/16. Prior to construction of riparian exclosure fence, the allotment would be limited to two weeks in June and two weeks in October each year (or four weeks in either June or October but not both) with riparian stubble height triggers for moving livestock set at 3-4 inches. After the exclosure fence is completed, late fall use would be allowable, but prior to this fence late fall AUMs would be in nonuse.

2. Private landowner may choose to build a new private land division fence (one mile long) in Lower North Dixie Pasture, to separate the large block of public land from the private land. This fence would give the permittee the option of moving to the private land in the allotment when utilization targets are reached on the public land, instead of moving entirely off the allotment. If the permittee chooses not to build this fence, 20 percent of the grazing preference in the allotment would be kept in nonuse.
3. Riparian enclosure would be constructed along one mile of upper North Dixie Creek, with maintenance responsibility belonging to the permittee. This enclosure would eliminate livestock grazing from public land portions of the creek and ensuring that at least 3-4 inches of riparian stubble height is left at the end of the growing season. The BLM expects that significant improvement to riparian rangeland health would occur as a result of fencing the riparian area.
4. Failure to meet end-of-season stubble height targets for two consecutive years in North Dixie Creek Allotment would result in limiting use in the third year only to the amount of exchange-of-use or private land AUMs in that pasture.
5. Upland utilization target would be set at 50 percent. Failure to meet upland utilization targets for two consecutive years in the North Dixie Creek Allotment would result in limiting use in the third year only to the amount of exchange-of-use or private land AUMs.

Lost Basin Allotment #1027

1. The season of livestock use in Upper Reagan Creek (mostly private land pasture) would be changed from unrestricted to 6/1-7/10. Stubble height targets would be set at 3-4 inches (measured around the time of first frost). Based on Clary and Leininger (2000) the BLM expects that setting a stubble height target will make significant progress towards meeting riparian rangeland health.
2. Juniper and aspen jack strawing at the aspen grove; approximately 10 acres. In addition to restricting livestock access as described in previous sections, jack strawing would also encourage aspen re-sprouting. This project is to assist in achieving Standard 5.
3. Two spring sources would be fenced by fall of 2012 to protect spring sources and adjacent riparian areas. This project is needed to assist in achieving Standards 2, 4, and 5 on 2.5 acres within the Lost Basin Allotment.

Financial commitments necessary to implement the alternative would be secured by BLM as funding becomes available, and through cooperation with grazing permittees. Improved protection of cultural resources and traditional foods would result with this alternative.

The implementation of Alternative 3 will allow the allotments to make significant progress toward meeting standards for healthy rangelands, which is required by 43 CFR 4180.2. To make significant progress towards meeting upland rangeland health (Standards 1 and 3) livestock deferment during the plant critical growth stage would be set consistent with Brewer et al. (2007) recommendations. Livestock management consistent with Brewer et al. (2007) has been shown to improve plant vigor of bluebunch wheatgrass which is highly sensitive to livestock grazing (Anderson 1991). Specifically, livestock allotments in the Pedro Mountain GU that were

managed in the recent past (since 1995) consistently with Brewer et al. (2007) recommendations meet rangeland health Standards 1 and 3. Therefore, the BLM believes that slight modifications to the timing of livestock grazing identified in this alternative would result in significant improvement to rangeland health Standards 1 and 3. In fact recent upland trend monitoring collected by the BLM shows that the interim livestock management, which implemented the same changes to season of use as Alternative 3, is resulting in significant improvement towards meeting upland rangeland health standards.

To make significant progress towards meeting riparian rangeland health (Standards 2 and 4) a riparian stubble height target, consistent with Clary and Leininger (2000) recommendation would be set (3-4 inches). This recommendation has been shown to make significant improvement in stream width to depth ratio, streambank stability, channel bottom embeddedness, willow cover and height, plant species richness by growth form, plant community-type and plant and litter cover, which are all components of rangeland health Standard 2 (Clary and Leininger 2000; Clary 1999). In order to achieve the stubble height targets, the BLM believes that reductions in AUMs are needed in two allotments and a total of 4.1 miles of fences to be built in four allotments is required. Allotments failing rangeland health Standard 4 were due to high water temperatures. Increasing willow cover and height, which the BLM expects would occur thru implementation of Clary and Leininger (2000) recommendation, would increase stream channel shade and thus lowering water temperatures resulting in significant progress towards meeting rangeland health Standard 4. In addition, reducing the stream channel width-to-depth ratio would also reduce water temperatures by reducing water surface area.

The degree of not meeting rangeland health in three allotments was drastic enough to cause Standard 5 to fail. However, the BLM expects that significant progress will be made towards meeting rangeland health thru the implementation of grazing management consistent with Clary and Leininger (2000) and Brewer et al. (2007) recommendation for the reasons stated above.

Beneficial and adverse effects. The cumulative effects are positive, there will be no significant effects (positive or negative) as described by the CEQ definition. Rangeland and watershed health, ecological functions, productivity, upland wildlife habitat, and riparian habitat will be protected and improved by the combined benefits of the proposed actions, which include setting minimum riparian stubble height targets, fencing, reduction in Animal Unit Months (AUMs), eliminating hot season grazing and restricting grazing during the critical plant growth stage (2011 Revised EA, page 11-22). Special status species will be protected because changes to livestock management, juniper reduction and fencing will improve rangeland health by leaving adequate residual riparian stubble height to protect riparian areas and restricting grazing during the critical growing season which will improve upland rangeland health Standards 1 and 3 (2011 EA, page 15). Cultural resources will be protected by design features developed during consultation between Baker Resource Area BLM, the Oregon SHPO and the Confederated Tribes of the Umatilla Indian Reservation (2011 Revised EA, page 24-26). In addition, protection from increased livestock distribution and reduced grazing effects on soils, riparian and upland vegetation, would be beneficial for protection of cultural resources (2011 Revised EA,

page 128). Outstanding opportunities for primitive and unconfined recreation will remain, and naturalness will be enhanced. Grazing operations will be more costly to operate, but will remain sustainable.

Public health or safety. There will be no significant effects on public health or safety. The proposed gap fences and implementation of the new grazing systems will not significantly affect public health and safety. Any threats will be localized, limited to those involved with construction and maintenance activities, and within accepted norms for such work.

Unique areas. There are no unique, specially managed areas within the Pedro Mountain Geographic Unit, including WSAs, WSRs, and ACECs; thus, none would be significantly affected.

Highly Controversial Effects. The new grazing systems will place new burdens on the affected ranchers, as livestock will be moved more often. The cost of project construction will be partially borne by the permittees and the maintenance responsibility will be totally borne by them. These new costs will be added to the operational costs they already bear and will certainly have negative impacts on their profits. Nevertheless, the grazing operations will remain sustainable, and rangeland health and productivity will be protected and enhanced. Similar measures have been successfully initiated by voluntary agreement with permittees (as under the interim grazing measures initiated in accordance with 43 CFR 4180 in the spring of 2003) and elsewhere on the Vale District. Therefore, they should not be considered controversial. Any effects on the human environment which are related to “land use” allocation issues were addressed and decided in the Baker RMP and Ironside EISs and the subsequent Records of Decision (ROD), and are outside the scope of this EA.

Unique or unknown risks. There are no unique or unknown risks associated with the implementation of the proposed action. The Baker RMP and Ironside EISs, and the revised 2011 EA, cover the anticipated impacts thoroughly. They rely on applicable scientific findings, monitoring, rangeland health assessments, published studies, professional contacts, and stated mitigation measures and project design criteria to address and/or preclude impacts.

Precedent for future actions. There are no precedents, relative to future actions with significant effects, which will be established. The specific actions involved in the proposed action have all been done before, separately and collectively, in the course of management of public lands over the past 50 years. There are no irreversible commitments of resources involved with the proposed action. The structural projects involved could be eliminated and the physical disturbance rehabilitated.

Cumulative Effects. The impact of proposed actions have been analyzed and considered, separately and cumulatively, at multiple scales of analysis by considering the Interior Columbia Basin Ecosystem Management Project (ICBEMP) science findings, the Baker RMP and Ironside EISs, and the 2011 EA. Impacts are either not significant, or were declared and addressed in the Baker RMP and Ironside EISs. The cumulative effect of implementation of the proposed action

is also not significant and is within the scope of the cumulative effects analysis disclosed in the Baker RMP and Ironside EISs, which this EA incorporates by reference.

The cumulative effects to sage-grouse was an issue that was brought up during the last public comment period. Given how agriculture and urbanization has resulted in a loss of approximately 44,200 acres of ODFW defined sage-grouse habitat within the Baker Resource Area, we assume the combined effects of past and present actions identified in the U.S. Fish and Wildlife Service listing factor 1 has resulted in the largest adverse effects to sage-grouse habitat in the Baker Resource Area administrative boundary. We believe that most of the adverse effects are associated with past management actions that converted private lands to agricultural, public and private lands being converted to non-native annual grass vegetation communities and juniper encroachment on native sagebrush vegetation communities. However, management actions identified in the 2011 EA, along with reasonable foreseeable juniper and non-native grass reduction projects, would aid in reducing the magnitude of adverse effect as a result of past private and public management actions by increasing the quality of at risk sagebrush communities. Therefore, the additive effect of implementing the preferred alternative would reduce the adverse effects of past land management actions on sage-grouse habitat (2011 EA page 99).

Impacts to significant scientific, cultural, or historic resources. Cultural, historical and/or scientific resources in the area are protected by design features and monitoring, and will not be adversely affected by the proposed action. The combination of management actions and design features under the proposed action will facilitate dispersed distribution of livestock and reduce grazing effects on soils, riparian and upland vegetation, which would be beneficial for protection of cultural resources. Design features, described in section 2.5 of the EA, include inventories prior to any surface disturbing development or project maintenance, continued sampling inventories, and consultation with the Oregon SHPO and Tribes on potential effects and appropriate mitigation measures for any identified eligible or potentially eligible historic properties. Consultation has occurred with the Oregon SHPO and interested tribes. Cultural resource surveys have occurred and will be ongoing throughout the ten year permit. Reports will be provided to interested tribes and Oregon SHPO for newly identified site specific consultation (2011 EA pages 24 and 25).

Federally listed endangered or threatened species. There are no known federally listed species in Pedro Mountain Geographic Unit. The proposed livestock management, which implements a timing and duration of livestock use that is appropriate for riparian areas, will be beneficial for all wildlife and aquatic species present. If special status species are discovered, additional mitigation measures such as inventory and avoidance of special status plants, and surveys prior to land treatment, would be done in conformance with Oregon/Washington special status species policy. Greater sage-grouse habitats will be protected as a result of livestock utilization limits, reduction of AUMs, changes in season of use, limited project development, project design features, specific mitigation measures associated with projects and by improvement and maintenance of riparian and upland systems through vegetation treatments. These changes will

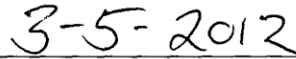
assist in meeting moderate levels of livestock use as recommended by the Oregon Department of Fish and Wildlife's ODFW Sage-Grouse Conservation Assessment Strategy and the Greater Sage-Grouse Conservation Assessment and Strategy for Oregon 2005 (ODFW 2011, 2011 EA page 88).

Compliance with federal, state, or local law. The proposed action is in compliance with federal, state, and local law and requirements relative to environmental protection. Further, it is in conformance with the Baker RMP and Ironside EIS and RODs.

Based on the analysis of potential environmental impacts contained in the 2011 EA and all other available information, I have determined that the proposed action does not constitute a major federal action that would significantly affect the quality of the human environment. Therefore, an Environmental Impact Statement (EIS) is unnecessary and will not be prepared.



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Date